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5 TROUTMAN PEPPER HAMILTON SANDERS LLP
 600 Peachtree St. NE # 3000
 Atlanta, GA 30308 (*Corporate Office*)
 7 Attorneys for Defendant Federal National Mortgage Association

8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**
 10

11 TRP FUND IV, LLC, a Nevada Limited
 Liability Company,

12 Plaintiff,

13 vs.

14 FEDERAL NATIONAL MORTGAGE
 15 ASSOCIATION, a National Banking Entity;
 QUALITY LOAN SERVICE
 16 CORPORATION, a foreign corporation;
 DOES I through X, inclusive; and ROE
 17 ENTITIES XI through XX,

18 Defendants.
 19

Case No.: 2:22-cv-00416-GMN-NJK

**STIPULATION AND ORDER TO
 EXTEND TIME TO RESPOND TO
 THE MOTION TO REMAND TO
 STATE COURT (ECF NO. 8)**

20 Plaintiff TRP Fund IV, LLC (**TRP**). and Federal National Mortgage Association
 21 (**Fannie Mae**), by their attorneys, hereby submit this Stipulation for an extension of time for
 22 Fannie Mae to answer or otherwise plead up to and including May 8, 2022. In support of this
 23 Stipulation, the parties state as follows:

24 1. On March 22, 2022, TRP filed a motion to remand this action to state court (ECF
 25 No. 8), and Fannie Mae's response is due on April 5, 2022.

26 4. Counsel that previously represented Fannie Mae, Aaron Lancaster, no longer
 27 works for Troutman Pepper Hamilton Sanders LLP, and his replacement does not start until

1 April 11, 2022. Counsel handling this file until that date, Brody Wight, will be out of the country
 2 until April 5, 2022, on his honeymoon.

3 5. For the above reasons, the parties have agreed to extend the date to respond to the
 4 motion to remand to April 19, 2022. The parties are requesting the extension in good faith and
 5 not to cause undue delay.

6 DATED this 28 day of March 2022

7 **THE WRIGHT LAW GROUP, P.C.**

8 /s/ John H. Wright

9 John H. Wright, Esq.
 10 Nevada Bar No. 6182
 2340 Paseo Del Prado, Suite D-305
 11 Las Vegas, NV 89102
 12 *Attorney for Plaintiff TRP Fund IV, LLC*

DATED this 28 day of March 2022

TROUTMAN PEPPER HAMILTON SANDERS LLC

/s/ Brody R. Wight

Brody R. Wight, Esq.
 Nevada Bar No. 13615
 8985 S. Eastern Ave., Ste. 200,
 Las Vegas, NV 89123 (*Nevada Office*)
 600 Peachtree St. NE # 3000, Atlanta, GA 30308
*Attorney for Defendant Federal National
 Mortgage Association*

13 Respectfully submitted by:

14 **TROUTMAN PEPPER HAMILTON SANDERS LLP**

15 /s/ Brody R. Wight

16 Brody R. Wight, Esq.
 17 Nevada Bar No. 13615
 8985 S. Eastern Ave., Ste. 200, Las Vegas, NV 89123 (*Nevada Office*)
 18 600 Peachtree St. NE # 3000, Atlanta, GA 30308
 19 *Attorney for Federal National Mortgage Association*

20 **IT IS SO ORDERED.**

21 Dated this 4 day of April, 2022.

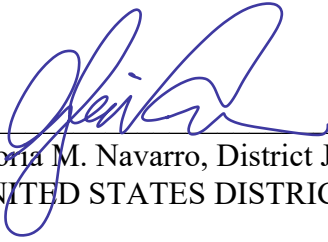
22 
 23 _____
 24 Gloria M. Navarro, District Judge
 25 UNITED STATES DISTRICT COURT
 26
 27
 28

EXHIBIT 1

Duarte, Evelyn S.

From: John Wright <john@wrightlawgroupnv.com>
Sent: Monday, March 28, 2022 4:08 PM
To: Wight, Brody R.; Mark Anderson; Candi Ashdown; Dayana Shakerian
Cc: Duarte, Evelyn S.; Hill, Christina N.
Subject: RE: TRP Fund IV v. Fannie Mae 2:22-cv-00416- Dardenelle

EXTERNAL SENDER

Yes, I agree to all of that

John Henry Wright, Esq.

The Wright Law Group, P.C.
2340 Paseo Del Prado, Suite D-305
Las Vegas, Nevada 89102
Telephone: (702) 405-0001
Facsimile: (702) 405-8454
john@wrightlawgroupnv.com



From: Wight, Brody R. <Brody.Wight@troutman.com>
Sent: Monday, March 28, 2022 9:40 AM
To: John Wright <john@wrightlawgroupnv.com>; Mark Anderson <mark@wrightlawgroupnv.com>; Candi Ashdown <Candi@wrightlawgroupnv.com>
Cc: Duarte, Evelyn S. <Evelyn.Duarte@troutman.com>; Hill, Christina N. <Christina.Hill@troutman.com>
Subject: RE: TRP Fund IV v. Fannie Mae 2:22-cv-00416

Hi John,

I just wanted to confirm a few things. First, I have confirmed that the foreclosure sale has officially been postponed to July on this one. I also wanted to confirm that you will allow us to file a responsive pleading after the motion to remand has been decided and will not file default. Finally, I wanted to ask if you would stipulate on an extension to respond to the motion to remand. Right now it is due on April 5, and I wanted to know if you would give us two weeks on that.

Brody R. Wight

Attorney

troutman pepper

Direct: 470.832.5562 | Mobile: 801.645.8978

From: John Wright <john@wrightlawgroupnv.com>
Sent: Tuesday, March 22, 2022 2:16 PM
To: Wight, Brody R. <Brody.Wight@troutman.com>; Mark Anderson <mark@wrightlawgroupnv.com>; Candi Ashdown <Candi@wrightlawgroupnv.com>
Cc: Duarte, Evelyn S. <Evelyn.Duarte@troutman.com>; Hill, Christina N. <Christina.Hill@troutman.com>
Subject: RE: TRP Fund IV v. Fannie Mae 2:22-cv-00416

EXTERNAL SENDER

Looks good- you may esign for me

John Henry Wright, Esq.

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john@wrightlawgroupnv.com



From: Wight, Brody R. <Brody.Wight@troutman.com>
Sent: Tuesday, March 22, 2022 12:40 PM
To: John Wright <john@wrightlawgroupnv.com>
Cc: Duarte, Evelyn S. <Evelyn.Duarte@troutman.com>; Hill, Christina N. <Christina.Hill@troutman.com>
Subject: RE: TRP Fund IV v. Fannie Mae 2:22-cv-00416

Hi John,

In light of our conversation yesterday, I have attached an SAO regarding our responsive pleading. Please let me know if it looks ok to file.

Brody R. Wight

Attorney

troutman pepper

Direct: 470.832.5562 | Mobile: 801.645.8978

brody.wight@troutman.com

From: Wight, Brody R.

Sent: Monday, March 21, 2022 8:40 AM

To: 'john@wrightlawgroupnv.com' <john@wrightlawgroupnv.com>

Cc: Duarte, Evelyn S. <Evelyn.Duarte@troutman.com>; Hill, Christina N. <Christina.Hill@troutman.com>

Subject: TRP Fund IV v. Fannie Mae 2:22-cv-00416

Hi John,

Aaron Lancaster from our office has been handling this case on behalf of Fannie Mae. He has now left Troutman, and we have hired a new attorney to take his place, but she does not start for a bit. I was wondering if you would stipulate to push out all of the deadlines in this case a month including the deadline to file a response to the Complaint, which I believe is due tomorrow? I would very much appreciate any cooperation you could offer.

Brody R. Wight

Attorney

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